

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

UNITED STATES OF AMERICA

v.

EDWARD CONSTANTINESCU,  
PERRY “PJ” MATLOCK,  
JOHN RYBACZYK,  
GARY DEEL,  
STEFAN HRVATIN,  
TOM COOPERMAN,  
MITCHELL HENNESSEY,  
DANIEL KNIGHT.

No. 4:22-CR-00612-S

**DEFENDANT’S SUPPLEMENTAL PROPOSED VOIR DIRE**

TO THE HONORABLE ANDREW HANEN, UNITED STATES DISTRICT JUDGE:

COMES NOW EDWARD CONSTANTINESCU and submits this supplemental proposal that respectfully requests that the following questions, and any related follow-up, be asked of the jury panel during voir dire:

1. In the last decade, social media has transformed into a major presence in American life.  
What is your opinion of social media? What types of social media platforms do you use?
2. With the rise of social media use in American culture, so has a new form of popularity through “internet celebrity”. What are your opinions of people who are famous online because of their online presence?
3. Several of the topics at issue in this case have been highlighted in the media and through entertainment in recent years. One example is the 2023 film *Dumb Money* that dramatized the true events surrounding the “Meme Stock” phenomenon, specifically with

regards to the mass increase in GameStop's stock price. Who has watched this movie?

What was your opinion of it?

Respectfully submitted,

/s/Emily Klair Bloom

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Edward Constantinescu*

**CERTIFICATE OF SERVICE**

I hereby certify that on March 14, 2024, a true and correct copy of the foregoing document has been electronically served on all counsel of record via the Court's CM/ECF system.

/s/*Emily Klair Bloom*  
Emily Klair Bloom